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Attorneys for Plaintiffs  
Planet Aid Inc. and Lisbeth Thomsen

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

PLANET AID INC.; and LISBETH  
THOMSEN,

Plaintiffs,

v.

REVEAL, CENTER FOR INVESTIGATIVE  
REPORTING; MATT SMITH; and AMY  
WALTERS,

Defendants.

Case No. 17-cv-03695-MMC

**RESPONSE TO MOTION BY  
DEFENDANTS TO EXTEND THE TIME  
LIMIT UNDER FED.R.CIV.P. 54(d)(2)(B)**

Plaintiffs hereby respond to the motion by Defendants to extend the time for filing an application pursuant to Fed.R.Civ.P. 54(d)(2)(B) so that they may file an application for fees and expenses pursuant to California Code of Civil Procedure § 425.16(c) (Dkt. Entry 311). Defendants failed to confer with counsel for Plaintiffs for filing the motion, as required by local rules. Plaintiffs nevertheless consent to the requested thirty-day extension without waiving their

1 argument that fees and expenses are not recoverable under Section 425.16.

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3 Dated: April 1, 2021

Respectfully submitted,  
NELSON, MULLINS, SCARBOROUGH & RILEY

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5 By: /s/ Samuel Rosenthal  
6 Sam Rosenthal (pro hac vice)

7 Attorneys for Plaintiffs Planet Aid, Inc.  
8 and Lisbeth Thomsen  
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